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*Attorney for Plaintiff Six Minutes, LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

SIX MINUTES, LLC, a Nevada limited-  
liability company;

Plaintiff,

v.

HARRISON “LANNY” MORTON, an  
individual; DEENA MORTON, an individual;  
and MORTON ENTERPRISES, LLC, an  
Arizona limited-liability company,

Defendants.

Case No.: 2:11-cv-01996-JCM-GWF

**DECLARATION OF SHAWN A.  
MANGANO, ESQ. IN SUPPORT OF  
REPLY BRIEF OF PLAINTIFF SIX  
MINUTES, LLC’S MOTION TO  
REMAND AND REQUEST FOR  
ATTORNEY’S FEES AND COSTS  
PURSUANT TO 28 U.S.C. § 1447(c)**

***ON SHORTENED TIME PURSUANT TO  
LR 6-1***

I, Shawn A. Mangano, Esq., declare, under penalty of perjury, that the following is true  
and correct:

1. I have personal knowledge of the facts set forth herein, except for those  
statements expressly made upon information and belief, and as to those facts, I believe them to  
be true. I am over eighteen years old and I am competent to testify to the matters set forth  
herein.

2. I am duly licensed to practice law in the State of Nevada and I am counsel of  
record for Six Minutes in this case.

1           3.       This declaration is submitted in support of Plaintiff Six Minutes, LLC's ("Six  
2 Minutes") reply brief to its motion to remand and request for attorney's fees and costs pursuant  
3 to 28 U.S.C. § 1447(c), which is being entertained by the Court on shortened time.

4           4.       Harrison "Lanny" Morton ("Lanny Morton") and Deena Morton ("Mrs. Morton")  
5 filed suit on December 15, 2011 against Robert "Bob" Proctor, a citizen of Toronto, Canada,  
6 Sandra Gallagher, a citizen of the State of California, Six Minutes, LLC, a Nevada limited-  
7 liability company, International Education Systems, Inc., a Nevada corporation, and Life Success  
8 Productions, LLC, a Nevada limited-liability company in the Superior Court of Arizona,  
9 Maricopa County, that has been assigned Case No. Cv 011 021906 (the "Arizona Action").

10          5.       Attached hereto as Exhibit 1 is a true and correct copy of an Order to Show Cause  
11 issued by the Superior Court of Arizona, Maricopa County in the Arizona Action which requires  
12 Six Minutes, along with the other named defendants, to appear on ***January 3, 2012, at 9:00 a.m.***  
13 and demonstrate why a preliminary injunction should not issue against them.

14          6.       I have reviewed all materials submitted in connection with the Arizona Action  
15 and there is no mention of Six Minutes having filed suit in the Eighth Judicial District Court  
16 against Lanny Morton and Mrs. Morton. There is also no mention in the materials submitted in  
17 connection with the Arizona Action that Lanny Morton and Mrs. Morton removed Six Minutes'  
18 action to this Court on or about the same time they filed suit in the State of Arizona.

19          7.       A review of the Arizona Action reveals that all asserted claims would likely  
20 constitute compulsory counterclaims in this case.

21          8.       Should the Court elect to exercise jurisdiction over this matter, Six Minutes  
22 respectfully requests that a hearing on its application for a temporary restraining order be held as  
23 soon as possible.

24               Signed and affirmed this 22<sup>nd</sup> day of December, 2011 under the penalty of perjury.

25  
26  
27                               /s/ Shawn A. Mangano  
28                               Shawn A. Mangano, Esq.

**CERTIFICATE OF SERVICE**

Pursuant to Federal Rule of Civil Procedure 5(b), I hereby certify that I on this 22<sup>nd</sup> day of December, 2011, I caused the foregoing document to be served by the Court's CM/ECF system.

By: /s/ Shawn A. Mangano  
SHAWN A. MANGANO, ESQ.  
Nevada Bar No. 6730

**EXHIBIT 1**